

PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to establish, document, review and modify access to Electronic Protected Health Information (ePHI) in accordance with MDHHS information access management policy and as stated in the access authorization operational policy.

REVISION HISTORY

Reviewed: 01/01/2022.

Next Review: 01/01/2023.

DEFINITIONS

ePHI is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

PHI is an acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

Workforce Member means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

POLICY

It is the policy of the MDHHS to authorize the type and extent of access to ePHI based on MDHHS' *minimum necessary policy*, which is one of its HIPAA privacy policies, and other policies as appropriate. Access to ePHI will be granted only to workforce members who require specific information to accomplish the work responsibilities of their position and will be granted on a need to know basis. Access shall be specified, documented, reviewed periodically and revised as necessary.

Access to ePHI shall not be attempted by unauthorized workforce members who are not authorized to access sensitive information or ePHI under this policy.

MDHHS workforce members who manage systems containing or transporting ePHI, as well as managers and/or supervisors of workforce members who use data, shall determine and authorize

appropriate access to ePHI systems and document the process for authorizing such access.

PROCEDURE

MDHHS Security Officer/Supervisor

The MDHHS security officer/supervisor will:

- Establish and document different access levels to ePHI.
- Document the establishment of access to ePHI.
- Regularly review workforce members' access privileges to ePHI.
- Modify access privileges of workforce members to ePHI as appropriate, based on periodic reviews.

REFERENCES

45 CFR 164.308(a)(4)

CONTACT

For additional information concerning this policy and procedure, contact the MDHHS Compliance and Data Governance Bureau at MDHHSPrivacySecurity@michigan.gov.